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## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DISTRICT

GOVERNMENT OF GUAM RETIREMENT FUND, et al.,

Plaintiff,

vs.

INVACARE CORPORATION, et al.,

Defendants.

JUDGE CHRISTOPHER A. BOYKO

Case No. 1:13CV1165

DECLARATION OF BENJAMIN GALDSTON IN SUPPORT OF LEAD PLAINTIFF'S MOTION FOR CLASS CERTIFICATION

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I, Benjamin Galdston, declare:

1. I am a partner with the law firm of Bernstein Litowitz Berger & Grossmann LLP,

Lead Counsel for the Court-appointed Lead Plaintiff, Government of Guam Retirement Fund

("Guam" or "Lead Plaintiff"), in the above-captioned action. This declaration is submitted in

connection with Lead Plaintiff's Motion for Class Certification filed concurrently herewith. I am

familiar with and have personal knowledge of the pleadings and proceedings in this case and the

facts set forth in this declaration and, if called upon to do so, could and would testify

competently thereto.

2. Attached hereto in further support of Lead Plaintiff's Motion for Class

Certification are true and correct copies of the following:

Exhibit A: Expert Report of Bjorn I. Steinholt, CFA.

Exhibit B: Firm Resume of Bernstein Litowitz Berger & Grossmann LLP.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true

and correct.

Executed on January 30, 2015, in San Diego, California.

/s/ Benjamin Galdston

Benjamin Galdston

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**CERTIFICATE OF SERVICE** 

A copy of the foregoing was filed electronically this 30th day of January, 2015. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

Parties may access this filing through the Court's system.

/s/ Benjamin Galdston

Benjamin Galdston

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